UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

THE BAIL PROJECT, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 1:22-cv-862-JPH-MJD
	)	
COMMISSIONER, INDIANA DEPARTMENT	)	
OF INSURANCE, in her official capacity,	)	
	)	
Defendant	)	

Motion for Preliminary Injunction

Plaintiff, pursuant to its counsel, moves this Court pursuant to Federal Rule of Civil Procedure 65, for a preliminary injunction in this case. In support of this motion plaintiff says that:

1.   It is likely to prevail on its claim that House Enrolled Act 1300 (eff. July 1, 2022) is unconstitutional.

2.   It is being caused irreparable harm for which there is no adequate remedy at law.

3.   The balance of harms favors the issuance of a preliminary injunction.

4.   The public interest would be served by the issuance of a preliminary injunction.

5.   In support of this motion the plaintiff will file evidentiary material at or prior to a preliminary injunction hearing and will timely file its memorandum of law in support of the motion.

6.   A briefing schedule should be established in this case.

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7.   The injunction should issue without bond.

WHEREFORE, plaintiff requests that after briefing and hearing that a preliminary

injunction be granted in this cause, without bond, and for all other proper relief.

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Certificate of Service

I certify that on this 4th day of May 2022, a copy of the foregoing was filed electronically with the Clerk of this Court and was served on the below-named party by first class U.S. Postage, pre-paid.

Commissioner
Indiana Department of Insurance
311 W. Washington St.
Indianapolis, IN 46204

I also certify that a courtesy copy of the foregoing was also served on this date on:

Thomas M. Fisher
Solicitor General
Office of the Attorney General
Tom.Fisher@atg.in.gov

[2]

[3]

Kenneth J. Falk
Attorney at Law